

Exhibit A

EEOC RECEIVED: 10-29-2024

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 440-2025-00962
Illinois Department of Human Rights and EEOC State or local Agency, if any	

Name (indicate Mr., Ms., Mrs., Mx.) Shelby Scholes		Home Phone (Incl. Area Code)	Date of Birth
Street Address		City, State and ZIP Code	Email Address
Street Address		City, State and ZIP Code	Email Address
c/o Mohammed O. Badwan, Sulaiman Law Group, 2500 S. Highland Ave., #200, Lombard, IL 60148 (mbadwan@sulaimanlaw.com)			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name The Carle Foundation Hospital d/b/a Carle Health		No. Employees, Members 15+	Phone No. (Include Area Code) (217) 383-3311
Street Address 800 E LOCUST ST		City, State and ZIP Code OLNEY, IL 62450-2553	Email Address myhr.helpdesk@carle.com
Name		No. Employees, Members 15+	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	Email Address

DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify below.)	DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 10/2023 9/30/2024 <input type="checkbox"/> CONTINUING ACTION
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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I, Shelby Scholes (female) was employed by The Carle Foundation Hospital d/b/a Carle Health as a Flight Nurse in or around June 2023 until on or around August 27, 2024 when I was unlawfully terminated on the basis of my sex (female) and my pregnancy.

The following is a non-exhaustive list of the sex and pregnancy discrimination and retaliation I was subjected to:

In or around October 2023, I informed my employer that I was pregnant. At that time, I could no longer fit into the flight suits and requested a maternity suit from John Nichols for the team. Instead of providing me with one, John Nichols laughed and said, "How about just don't get pregnant," and then suggested I "figure it out" by finding a men's suit.

In or around January 2024, my supervisor, Kristin Shringer, became overly critical of my work, despite knowing I had a high-risk pregnancy. After completing two back-to-back flights, I became ill and started vomiting, making it impossible for me to take another flight. My partner, Nikki, and I decided to take "crew rest." However, Kristin criticized me, saying I was "wasting the company's money" and insisted that if I was sick, I should go home. Kristin also required me to call her every time I got sick, even if it was in the middle of the night.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
I declare under penalty of perjury that the above is true and correct. 10 / 26 / 2024  Date Charging Party Signature	

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and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

In or around February 2024, I was forced to sign a document alleging that I was rude and aggressive to hospital staff, though I had no memory of such an incident. I knew which incident Kristin was referring to when she made this claim. A charge nurse at an outside hospital had spoken to me in a hostile manner, and I began advocating for our patient. Meanwhile, my coworker was in a separate argument with paramedics. I was reprimanded and forced to sign the document, but my coworker was not. Kristin refused to show me the formal complaint and would not let me explain the situation. She stated that the hospital did not like our company for other reasons, but she wouldn't elaborate.

My coworker later apologized to me for the situation in general. However, upon returning from maternity leave, this coworker stopped speaking to me. When I asked other crew members what was wrong, they informed me that Kristin had told the coworker while I was on leave that I had blamed him and "threw him under the bus" for that incident. Kristin also refused to let me explain the situation. When I followed up with HR, I was informed that they had no record of this document in my file.

At 28 weeks pregnant, I was placed on a 25-pound lifting restriction. Fearing retaliation from Kristin, I hesitated to report this, but when I did, she immediately took me off the schedule and directed me to HR, stating that no accommodations could be made at AirLife. I was told to file for short-term disability, even though I did not want to.

In or around March 2024, I was informed that I needed to interview for accommodations. The interviews were scheduled, and I was told that the managers would call me at a specific time. However, I never received the calls. After informing the HR member, the interviews were rescheduled. Eventually, I found two positions at different clinics within Carle Foundation, but both offered approximately \$10 less per hour in pay. When I complained to HR, I was told my pay could not be matched since I no longer held my previous position.

On or around April 15, 2024, I was scheduled for an induction of labor due to preeclampsia and was discharged on or around April 19, 2024. During this time, Kristin texted me, instructing me to call John Nichols, who informed me that my position had been posted for others to apply for while I was on maternity leave. When I asked why I hadn't been notified about this back in or around February, John told me, "It's the law, and you can look it up," advising me not to fight it because their legal team had already been contacted. John also said that if no one applied for my job, I could reapply upon my return.

I immediately contacted HR, who expressed shock upon learning this information. HR was surprised when I informed them that John Nichols had stated he was posting my job for someone else. Later that day, Stephanie Workman (HR) called me to say that she and John had been discussing posting my job "for a while," without informing me.

On or around April 25, 2024, HR called to apologize and confirmed that I would have my job back after completing my maternity leave. They also informed me that Kristin and John had acted improperly and were not allowed to take such actions.

I returned from maternity leave on or around July 11, 2024. Prior to my return, I wrote a letter to HR expressing concerns about retaliation from Kristin and John, but I was ignored. Upon my return, Kristin began documenting false allegations of incompetence and failures on my part. Despite requesting additional training to catch up from the time I missed due to pregnancy, I was targeted by Kristin. Other crew members warned me that Kristin was looking for any reason to get me fired, claiming I was incompetent. When Jordan brought this up to John Nichols, John dismissed it, stating that Kristin couldn't fire people. Jordan reminded him that Kristin could still report false information to John to get me fired and noted that Kristin had a history of bullying people out.

During my re-orientation, last-minute schedule changes were made, and when I complained, I was told, "Too bad."

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

10 / 26 / 2024

Date



Charging Party Signature

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In or around August 2024, I explained to the educator, Jessica Serafini, that I had studied during my maternity leave and felt competent. I suggested transferring to Jordan's team for a better work environment, and she agreed, saying she would speak to John Nichols and Jordan Stone. I was then transferred to Jordan's team, where the environment was indeed more positive. Jordan, the Base 2 supervisor, apologized for Kristin's behavior and arranged a meeting with John and Jessica to address the ongoing issues. However, John was dismissive, and Jessica's demeanor toward me changed after that meeting. I formally requested a transfer through HR, but my request was ignored. Kristin's behavior worsened—she openly discussed me negatively with others and blatantly ignored me, making me feel uncomfortable.

On or around August 12, 2024, I was failed on a performance exam that I believed I had performed well on. I was placed on a performance improvement plan (PIP) to work with a preceptor, Tracy, who did not engage with me during training and instead slept. I reported this to Jessica, John Nichols, Dr. Weir, and several other HR team members, but my concerns were not addressed. Tracy later apologized for isolating me, but when I asked if she had informed Kristin about the situation, Tracy said she had, but Kristin didn't seem to care.

During my second test on or around August 27, 2024, Dr. Wier, the medical director, couldn't make eye contact with me. While I felt confident in my performance, the examiners appeared to intentionally try to stump me. When I provided correct answers, they initially told me I was wrong, only to claim they had "heard me wrong" once I proved my answers were correct. I was failed again. Later that day, John Nichols, Jessica Serafini, and Dr. Wier informed me that they had decided to "cut ties" with me, placing me on leave and instructing me to contact HR. Additionally, there was a third person present during the test-out, which was unusual. They claimed it was to "work the mannequins" used to display vital signs on a screen, but it was clear she was there as a biased witness.

On or around August 30, 2024, I contacted HR and made it clear that I wanted an investigation into these actions. HR informed me that they would help me find another position within the organization. I spoke to several HR members, but they did not seem to take my concerns seriously. I escalated the matter to Lauren Schmid, the Chief Human Resource Officer, who set up a Teams meeting with me. I explained my concerns, and she seemed receptive. However, several weeks later, she called with an update, essentially stating that my claims were unfounded. I had warned HR that crew members were reluctant to speak up due to fear of retaliation. According to Lauren's report, Tracy (my preceptor) completely lied, along with many others. I expressed my fear numerous times that others' words would be taken as truth, while mine would be "investigated," which is exactly what happened.

On or around September 30, 2024, I received an email from HR stating that I was not terminated but placed on a 30-day unpaid administrative leave.

I have since been informed by others within the company, as well as by people from companies where Kristin previously worked, that targeting people is typical behavior for her. Since then, I have taken exams at several other companies and passed them all. I never failed any tests at AirLife prior to returning from maternity leave.

Thus, I have been discriminated against on the basis of my sex (female), my pregnancy and retaliated against in violation of Title VII of the Civil Rights Act of 1964, as amended, Pregnancy Discrimination Act of 1978, as amended and (775ILCS 5/) Illinois Human Rights Act.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

10 / 26 / 2024

Date



Charging Party Signature

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I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

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(month, day, year)